

Nelson, Beverleigh

From: Skipper, Jennifer
Sent: Friday, May 13, 2022 4:21 PM
To: Nelson, Beverleigh
Subject: FW: [EXTERNAL] MTC Confidential Exhibits

From: Jennifer Neal <jneal@wattsguerra.com>
Sent: Friday, May 13, 2022 4:14 PM
To: Skipper, Jennifer <jskipper@balch.com>; rreed@pulmanlaw.com; Robert Brzezinski <rbrzezinski@wattsguerra.com>
Cc: Boone, Walter <wboone@balch.com>; Handy, Kye C. <khandy@balch.com>
Subject: Re: [EXTERNAL] MTC Confidential Exhibits

[External Email] Please use caution.

Comments in red below.

From: Skipper, Jennifer <jskipper@balch.com>
Date: Friday, May 13, 2022 at 3:08 PM
To: rreed@pulmanlaw.com <rreed@pulmanlaw.com>, Jennifer Neal <jneal@wattsguerra.com>, Robert Brzezinski <rbrzezinski@wattsguerra.com>
Cc: Boone, Walter <wboone@balch.com>, Handy, Kye C. <khandy@balch.com>
Subject: [EXTERNAL] MTC Confidential Exhibits

Hi all –

Below you'll find a sharepoint site for exhibits to the motion which have been marked confidential.

There are certain documents which were marked confidential during the production in discovery due to their inclusion in a family which is confidential. We intend on removing that designation for the bates labeled documents below:

Wolf-AETC-Gen02-002158; 6688; 7344; 7345; 7347-51; 7357; 7360; 7362; 7366; 7368. These are all FB posts. Just for these bates confidentiality does not attach and we will not make them confidential. **I can't tell if these were public posts or not. If not, there are some I would prefer to keep confidential. Photos of her son, photos of her underarm rashes, etc.**

Kline-AETC-Gen01-129-130 is a FB post which was part of a larger document. Kline-AETC-Gen01-261 is also a FB post. We do not feel that these are confidential in nature and intend on removing confidential for these bates alone. **That's fine.**

Hamilton-Gen01-13-14; Gen02-10190 were part of a family of documents; however, as FB posts we do not feel these would be confidential like the others. Leilani Hamilton's list of FB groups is marked is Exhibit 239. As an exhibit it has been deemed confidential. Do you wish to mark the exhibit confidential with the remainder of the deposition or can that be filed as an exhibit? **Keep Exh 239 confidential.**

The remainder of the confidentiality documents is testimony excerpts or part of correspondences marked confidential.

Let me know about the exhibit.

https://balch4-my.sharepoint.com/:f:/g/personal/bnelson_balch_com/EoKW-Nddr6BAiDEWbDiA0TsBByKtBCvyhLf3pmb5RJ461Q?e=V2FAQo



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